Comment on GN 25-133

RE: **Delete 15.203**

The rules on ‘unique antenna connector’ were put in place to prevent unauthorized use of antennas on unlicensed devices. The provisions of the requirement mandate use of a ‘unique’ antenna connector which if one was ever created, the first action would be to create an adapter to a different connector for the purposes of testing the product thereby obviating the uniqueness of the connector.

In today’s digital world, any general user can obtain antennas or connector adapters, even if the connector was unique. The practical application of this rule is completely unenforceable with today’s interconnectedness.

The FCC rules already include provisions such as 15.21 which warn that unauthorized modification of the product could void the user’s authority to operate the product. Furthermore, 2.909(d) defines the party responsible for compliance as the party which performed any modification, thus legal accountability and enforceability of FCC laws for persons performing modifications thereby assuaging the concerns for enforcement actions.

Put bluntly: 15.203 is already antiquated and serves no practical purpose.

15.203 should be deleted.

Respectfully submitted,
Randy Clark,
CKC Certification Services, LLC.